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# ***MSO Memphis Information Bulletin***

## **MERCHANT MARINER LICENSING AND DOCUMENTATION**

The mission of MSO Memphis is to protect the safety and security of the public, merchant mariners, and maritime industry; the ports, waterways, and the environment; and the economic vitality of the marine transportation system by preventing, responding, and investigating maritime incidents. One of the ways in which we accomplish this mission is by issuing professional licenses and documents to merchant mariners. This information bulletin provides information on license and document application processing and discusses future challenges.

### **BACKGROUND**

A licensed officer must operate all passenger or towing vessels on the Western Rivers. Additionally, a documented merchant mariner qualified to act as a tankerman must supervise the transfer of oil or liquid hazardous materials to and from a tank barge. Each month Regional Exam Center in Memphis and the Monitoring Unit in St. Louis issue over 200 licenses and documents.

### **WHAT'S IMPORTANT TO MARINERS**

In an effort to improve service to the mariners, our customers, the Regional Exam Center worked with the Western Rivers Licensing Work Group to identify what is important to the mariner about the license and documentation services we provide. Three key attributes stood out as the most important:

- Timely issuance of the license or document
- The ability to track progress on the application processing, and
- Consistency in the evaluation process.

### **OUR PERFORMANCE GOALS**

In an effort to improve our services to the mariner, we've established performance goals that relate directly to what's important to the mariner. These goals include:

- Reducing the time it takes to process license and document applications.
- Improve customer service satisfaction.

### **THE PROCESS**

There are five major steps in the merchant license and document issuance process:

1. *User fee collection and initial review*
2. *Evaluation*
3. *Background check / medical waiver review*
4. *Examination*
5. *Issuance of credential*

Each application we receive goes through these five steps. Recent analysis of the process revealed that it takes on average 15 weeks for an application to be processed and a credential issued to the mariner. Since timely processing is important to the mariner, it was important to determine why it was taking this long. Here's what we found:

1. *User fees and initial review.*
  - During an average month, the REC receives over 160 applications. It takes less than one day to process user fees and check for missing information.
  - Over 30% of all applications either have incorrect fee amounts or are missing critical information.
  - It takes an average of 11 days for mariners to provide missing user fees or information.

2. *Evaluation.*

- Typically, it takes 27 days to begin evaluating an application. This is due to the large application backlog and the limited number of REC staff. Once it begins, an evaluation takes on average less than 12 days to complete.
- Over 50% of all applications are missing information needed to evaluate the applicant's eligibility and experience.
- It takes an average of 82 days for mariners to provide the missing information to the REC so the evaluation can continue.

3. *Background check / medical waiver review.*

- With the increase in security concerns, and with medical issues still an important part of the evaluation process, background checks and medical records review are an important part of the overall process. These checks and reviews, which are conducted at the National Maritime Center in Arlington, Virginia, take on average 34 days to complete.
- Over 17% of all applications require some sort of medical waiver review.

4. *Examination.*

- Depending on the type of license or document being applied for, an examination may or may not be required. While it usually takes 3 days for a mariner to take the examination, it takes over 34 days for the mariner to schedule a time to come to the REC to take the exam.

5. *Issuance of credential.*

- Once the evaluation and examination are completed, the credential is prepared for issuance. During an average month, the REC issues over 200 licenses or documents to merchant mariners.

CONCLUSIONS

Our analysis found bottlenecks throughout the entire process. Over 59% of the processing time is spent waiting on mariners to provide information missing from their original applications. This tells us that our application process is too complex or confusing. Another 22% of the processing time is spent waiting for background checks or medical waivers from the National Maritime Center. Process improvements are needed at the NMC to reduce this processing time. Finally, the REC staff spends the remaining 19% of time processing

the applications. To address this, the REC staff is focusing on increased training and ways to improve productivity.

KEY CHALLENGES

We face some key internal and external challenges in meeting our goals.

Internal Challenge:

*Reduce the time it takes for REC staff to conduct evaluations.* First of all, you can trust that we are doing our best to reduce the time it takes for the REC staff to evaluate applications through increased productivity. Early indicators show productivity increases of 22% among the REC staff.

External Challenges: Since critical information is missing from the majority of the applications we receive, your help is needed to work with mariners. One way you can help is by distributing the attached "Top Ten Reasons Why Coast Guard License Applications Are Delayed" to mariners you employ. Secondly, I encourage you to help your employees complete their applications or at least review them for completeness. This will greatly reduce processing time.

Finally, your comments will help us reduce processing time. Specifically, I'm interested in your thoughts and ideas on how we can:

- Reduce the number of applications with missing user fees and critical information;
- Reduce the time it takes for mariners to send missing information to the REC;
- Reduce the time it takes for the NMC to return background checks or medical waivers; and
- Reduce the complexity of the application and overall application process.

I remain committed to improving services we provide to the maritime community, and I ask for your continued support.

D. C. STALFORTH  
Commander, U. S. Coast Guard  
Captain of the Port  
Officer in Charge, Marine Inspection

# ***“TOP TEN REASONS”***

## **WHY CG LICENSING APPLICATIONS ARE DELAYED:**

1. Applications. If application is not completed, the application will be returned for correction. Three signatures are mandatory: Section III (Have you ever...? questions), Section V (consent of National Driver Registry check), and Section VI (application certification). Page two or three of the application are sometimes not sent in with the packet. Also when the “Applying for:” block is left blank or is incomplete the REC is left to guess what you want.
2. Drug screen. A drug screen is often rejected because it does not contain the Medical Review Officer’s (MRO) signature, is a photocopy, or a company compliance letter is over 60 days old or not written to meet the requirements of the Code of Federal Regulations, title 46 CFR 16.220.
3. Photographs. Merchant Mariner Documents (MMD) and STCW certificates cannot be printed without a photograph. Two passport size photos are needed when applying for a STCW or MMD, with the additional requirement of a thumbprint for a MMD (camera setup sheet).
4. Physical Exam. If the Merchant Marine Personnel Physical Examination/Certification Report is not complete it will be returned for correction. Particular attention is paid to the “competent, not competent, and needs further review” boxes (just above the physician’s address), which are frequently blank. Often the type of color vision exam given in section IV is not indicated, or mariners who wear glasses and/or contacts submit exams without their uncorrected vision listed in section III. The physician’s and/or the mariner’s certification signature is often omitted from the physical.
5. Original Certificates. Photocopies of essential documents, even if notarized, are not accepted. Only original signature, those signed by the issuing authority (such as course completion certificates) or official custodian (such as birth certificates), documents are acceptable. Original certificates will be returned when the evaluation is completed and the REC mails the newly issued credentials to the applicant.
6. User Fees. No or incorrect fees are included with the application. Licensing user fees changed as of October 4, 1999. Current fees are published in the most recent Code of Federal Regulations, title 46, part 10, section 109.
7. Current or Past License, Document, and/or STCW. A mariner who is holding, or has held, a license, MMD, and/or STCW certificated who does not indicate it in the history, section II, of the application or does not include a copy of their credentials (front and back) with the application package. This especially applies for renewals, and mariners with past transactions at other RECs.
8. Sea Service. Missing or conflicting information on the sea service letter such as: not including tonnage or horsepower, the position listed does not agree with other documents in the application package, or conflicting waters. Service should be documented with: discharges, letters from marine employers, or small boat sea service forms. If a small boat service form is used, it must be certified and signed by the owner, or proof of individual ownership is required.
9. Written Statement. If an applicant marks “Yes” in any block of Section III, a statement is required. Note that all questions begin with “Have you ever...” includes all past convictions, even ones that may have already been disclosed. Simply stating “on file” will not suffice, statements should include the what, when, where, and penalties assessed for each incident and if it has already been disclosed to the REC and if there have been any new incidents since. Even if all the information is there, the statement must be signed and dated by the applicant. If the statement includes a NDR offense (DUI, etc.), proof that a state driver’s license has been reinstated must be provided with the statement.
10. Medical Condition. Additional medical information is required whenever a medical condition is identified on the Merchant Marine Personnel Physical Examination Report and the proper information is not included on or with the physical exam report.